

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK**

JANE DOE, et al.

Plaintiffs,

vs.

HOWARD ZUCKER, et al.

Defendants.

Civil Action No.: 1:20 – CV – 0840 (BKS/CFH)

**DECLARATION OF R.B. IN SUPPORT OF
PLAINTIFFS' MOTION FOR A PRELIMINARY
INJUNCTION**

R.B. pursuant to 28 U.S.C. § 1746 declares under penalty of perjury as follows:

1. I am the father of two medically fragile children. We reside in the Sayville School District in New York.
2. I write this declaration in support of the Plaintiffs' motion for a preliminary injunction and as a potential class member in this suit.
3. My children have received most of the vaccines on the schedule. We stopped vaccinating after one son developed such a severe reaction that he is now permanently and severely disabled for life, and is undergoing stem cell therapy to try to repair the damage that has been done to him from his vaccine injury.
4. We ultimately obtained exemptions for both of our children and they were able to attend school last year.

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3 5. However, the process was extremely traumatic for our entire family. Given our family
4 medical history and the children's genetic vulnerabilities and vaccine adverse reactions,
5 it was clear to our physicians that our children should not receive more vaccines (they
6 are missing between them boosters of the DTaP, inactivated polio and varicella
7 vaccines).
- 8
9 6. However, under the new regulations, it was not enough for our physicians to simply
10 make clinical determinations and have that respected.
- 11 7. Instead, our privacy was significantly invaded. Our family has experienced more stress
12 since last summer than anyone should ever be subjected to.
- 13
14 8. Our children were subjected to an enormous amount of medical testing to substantiate
15 the need for the exemption.
- 16 9. The entire experience has negatively impacted our parenting experience in a profound
17 way. It is difficult to enjoy time with my children based on the constant stress that I
18 am now under.
- 19
20 10. We have been walking on eggshells wondering if our children would suddenly be
21 kicked out of school if some bureaucrat who has never met them or examined them
22 decided that they disagreed with our doctors, or that we have not provided enough
23 information.

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3 11. This situation has caused me great difficulty sleeping for the past year. Certain smells
4 from last summer trigger tremendous anxiety in the form of tightness in my chest and
5 shortness of breath.

6 12. I have developed a deep distrust of the government- particularly the government of the
7 State of New York. I live in a constant state of fear that a time will come when I will
8 no longer be able to protect my boys from a tyrannical and overreaching state
9 government that is hell-bent on vaccinating my children against my will and against
10 the strong advice of their physician, who is personally aware of their vulnerabilities,
11 thereby causing them even greater harm than has already been inflicted on my already
12 vaccine-injured son.
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14 13. No parent should ever have to choose between the health of their child and their
15 child's right to an education. The unconscionability of this situation is magnified with
16 our son who was injured, who is in even greater need of an education tailored to his
17 special needs, who will be denied that education unless we agree to more of the same
18 vaccines that caused his disability in the first place.
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20 14. Law abiding citizens living in a free country should not live in fear of their
21 government.
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23 15. Wherefore, I respectfully ask this Court to grant the relief and let our children remain
24 in school pending the outcome of this case and to stay the regulations that allow school
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2 districts to demand such invasive documentation and to prevent parents from being
3 allowed to follow the advice of their treating physicians.
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5 RESPECTFULLY SUBMITTED this 18th day of August 2020
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9 R.B.
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